

Exhibit B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JENNIFER ECKHART,	:	
	:	Case No. 1:20-cv-05593
Plaintiff,	:	(RA)(GWG)
	:	
v.	:	
	:	
FOX NEWS NETWORK, LLC and ED HENRY,	:	
in his individual and professional capacities,	:	
	:	
Defendants.	:	
-----	X	

**DEFENDANT FOX NEWS NETWORK, LLC’S OBJECTIONS AND RESPONSES TO
PLAINTIFF JENNIFER ECKHART’S FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Civil Rules 26.2, 26.3 and 33.3 of the United States District Court for the Southern District of New York, Defendant Fox News Network, LLC (“Fox News”) hereby responds and objects to Plaintiff Jennifer Eckhart’s First Set of Interrogatories.

GENERAL OBJECTIONS

The following General Objections apply to and are expressly made part of Fox News’ specific responses, set forth below, to each Interrogatory.

1. Fox News objects to the Instructions and Definitions (and the Interrogatories applying the Instructions and Definitions) to the extent they seek to impose obligations on Fox News that exceeds, or are inconsistent with, those imposed by the Federal Rules of Civil Procedure (the “Federal Rules”), the Local Rules of the United States District Court for the Southern District of New York (the “Local Rules”), and and/or the Court’s Individual Rules and Procedures for Civil Cases (the “Individual Rules” and collectively with the “Federal Rules” and the “Local Rules,” the “Rules”). Fox News will apply the definitions and instructions established in Rules 26 and 33 of the Federal Rules and Rules 26.3 and 33.3 of the Local Rules,

will respond to the Interrogatories in accordance with those Rules, and will not provide information and/or documents that exceed the requirements of the Rules.

2. Fox News objects to the Definitions and Instructions (and the Interrogatories applying the Definitions and Instructions) to the extent they seek to impose a broader definition of any term or phrase than the Uniform Definitions in Discovery Requests set forth in Local Rule 26.3. For purposes of Fox News' Objections and Answers to the Interrogatories, Fox News utilizes the definitions set forth in the Uniform Definitions in Discovery Requests in Local Rule 26.3.

3. Fox News objects to Plaintiff's Interrogatories to the extent they call for disclosure and/or production of documents or information protected by the attorney-client privilege, work-product doctrine, or other privilege, or which are otherwise immune from discovery. Inadvertent production of any such documents or information shall not constitute a waiver of any privilege with respect to the subject matter thereof or the information contained therein, and shall not waive Fox News's rights to object to the use of any such document (or the information contained therein) during any subsequent proceeding. All such inadvertently produced documents shall be returned to Fox News' counsel along with any copies thereof subject to the terms of any Stipulated Confidentiality Agreement and Protective Order.

4. Fox News objects to Plaintiff's Interrogatories to the extent they call for disclosure of (i) confidential business or proprietary information and/or (ii) confidential personnel information. Fox News will produce such confidential information only to the extent it is not otherwise subject to a different objection, and only pursuant to a Stipulation and Order of Confidentiality.

5. Fox News objects to Plaintiff's Interrogatories to the extent they seek documents or information without specifying any time period for same and, hence, are overly broad and unduly burdensome.

6. Fox News objects to Plaintiff's Interrogatories to the extent they call for the production of information or documents concerning events occurring outside the time period of Plaintiff's employment with Fox News.

7. Fox News objects to Plaintiff's Interrogatories to the extent they would require Fox News to (1) create any document not in existence at the time of their responses to Plaintiff's Interrogatory or (2) produce documents or information which are no longer or which never were in Fox News' possession, custody, or control.

8. Fox News objects to Plaintiff's Interrogatories to the extent that they are vague, ambiguous, and/or subject to several and/or conflicting interpretations. Fox News has tried to interpret the Interrogatories reasonably, but cannot represent in all cases that its interpretation is the same as that intended by Plaintiff.

9. Fox News objects to the Interrogatories to the extent they are not material or relevant to any party's claim or defenses.

10. To the extent any of the Interrogatories are premised on disputed allegations, Fox News' response to those Interrogatories shall not be deemed an admission of any such disputed allegation.

11. Fox News objects to the Interrogatories to the extent that the information and/or documents sought are unreasonably cumulative or duplicative, or are obtainable from some other source that is more convenient, less burdensome or less expensive.

12. In providing these objections and answers and responses to the Interrogatories and

Requests, Fox News does not waive or intend to waive, but, on the contrary, reserves and intends to reserve:

- a. all questions as to competency, ambiguity, vagueness, authenticity, relevancy, materiality, privilege, and admissibility of the information or documents produced hereunder or the subject matter thereof;
- b. the right to object on any ground to the use of the information or documents produced hereunder or the subject matter thereof at any trial or hearing in this matter or in any related or subsequent action or proceeding;
- c. the right to object on any ground at any time to a demand for further information or document production; and
- d. the right at any time to revise, supplement, correct, or add to their responses.

13. Fox News' objections and responses to the Interrogatories are without waiver of, or prejudice to, its right to later use additional information not set forth or referred to in these objections and responses.

SPECIFIC RESPONSES AND OBJECTIONS

INTERROGATORY NO. 1: Identify each and every person who has knowledge concerning any allegation in the Complaint or responses contained in the Answer.

RESPONSE TO INTERROGATORY NO. 1:

Fox News objects to this Interrogatory as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case, including that it is not limited in temporal scope and the use of the terms "each and every person" and "any allegation" or "response[.]" and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent this Interrogatory requires Fox News to speculate about the knowledge of persons who are not Fox News employees and those whom Fox News has not yet had the opportunity to depose.

Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Notwithstanding the foregoing objections and without prejudice thereto, Fox News identifies the following:

- Plaintiff Jennifer Eckhart has knowledge and information regarding the allegations in the Third Amended Complaint (“TAC”).
- Defendant Ed Henry, has knowledge and information regarding Eckhart’s allegations against him in the TAC. Upon information and belief, Fox News believes Henry can be contacted through his counsel who has appeared in the above-captioned case on his behalf.
- Brad Hirst, Executive Producer, has knowledge and information regarding Plaintiff’s employment and performance at Fox News and Plaintiff’s termination.
- Denise Collins, Senior Vice President of Human Resources, has knowledge and information regarding Fox News’ workplace policies and procedures, terms and conditions of Plaintiff’s employment, Plaintiff’s employment at Fox News and Plaintiff’s termination.
- Kevin Lord, Executive Vice President of Human Resources, has knowledge and information regarding Fox News’ workplace policies and procedures, Plaintiff’s employment at Fox News, Plaintiff’s termination, Henry’s terms and conditions of employment and Henry’s suspension and termination in 2020.
- Bill Shine, Former Co-President, has knowledge and information regarding Henry’s leave of absence in 2016 and terms and conditions of Henry’s employment.

- Dianne Brandi, Former General Counsel and Executive Vice President of Legal and Business Affairs, has knowledge and information regarding Fox News' workplace policies and procedures and Henry's leave of absence in 2016 and the terms and conditions of Henry's employment.
- Jay Wallace, President and Executive Editor, has knowledge regarding Henry's suspension and termination in 2020.

INTERROGATORY NO. 2: Identify each and every employee of Fox who has sent, received or created any documents, communications and/or ESI concerning any allegation in the Complaint.

RESPONSE TO INTERROGATORY NO. 2:

Fox News objects to this Interrogatory as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case, including that it is not limited in temporal scope and the use of the terms "each and every employee," "any documents, communications and/or ESI" and "any allegation" or "response[,]" and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Fox News objects as this Interrogatory is overly burdensome as duplicative of Plaintiff's Requests for the Production of Documents.

INTERROGATORY NO. 3: Identify each and every employee of Fox who was responsible at any time between 2016 and 2020 for receiving, processing or responding to any internal complaint concerning gender discrimination, sexual harassment, sexual misconduct or assault.

RESPONSE TO INTERROGATORY NO. 3:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms “responsible,” “receiving, processing or responding,” “internal complaint,” and “sexual misconduct.” Fox News further objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every employee” and as it seeks information from 2016 through 2020, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Subject to and without waiving these or the General Objections, Fox News identifies Kevin Lord, Denise Collins and its Human Resources and Legal Departments.

INTERROGATORY NO. 4: Identify each and every female employee and/or former female employee of Fox who has made, filed or issued any complaint about Henry, whether formally or informally, either internally with Fox or externally with any third-party, agency or court.

RESPONSE TO INTERROGATORY NO. 4:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms “made, filed or issued,” “complaint,” “formally or informally,” “internally with Fox” and “externally with any third-party[.]” Fox News further objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every female employee and/or former female employee,” its lack of temporal limitation to before February 2017 and to the extent it seeks complaints unrelated to Plaintiff’s present claims, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other

applicable privilege. Subject to and without waiving these or the General Objections, Fox News identifies Jennifer Eckhart.

INTERROGATORY NO. 5: Identify each and every person who investigated any complaints made against and/or about Henry.

RESPONSE TO INTERROGATORY NO. 5:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms “each and every person” “investigated,” “complaints” and “against and/or about[.]” Fox News further objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “any complaints” and its lack of temporal limitation, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News objects to the extent this Interrogatory requires Fox News to speculate about the knowledge of persons who are not Fox News employees. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Subject to and without waiving these or the General Objections, Fox News identifies Gregg Gillman and Sharon Cohen of Davis & Gilbert LLP.

INTERROGATORY NO. 6: Identify each and every employee and/or former employee of Fox who has made, filed or issued any complaint about gender discrimination, sexual harassment, sexual misconduct, sexual assault and/or battery, whether formally or informally, either internally with Fox or externally with any third-party, agency or court.

RESPONSE TO INTERROGATORY NO. 6:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms “made, filed or issued,” “complaint,” “sexual misconduct,” “formally or informally,”

“internally with Fox” and “externally with any third-party[.]” Fox News further objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every employee and/or former employee” and “any complaint” and its lack of temporal limitation to before February 2017, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Subject to and without waiving these or the General Objections, Fox News identifies Jennifer Eckhart.

INTERROGATORY NO. 7: Identify each and every person with information or knowledge concerning any complaints made by Ms. Eckhart during her employment with Fox.

RESPONSE TO INTERROGATORY NO. 7:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms “each and every person” “information or knowledge” “complaints.” Fox News further objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every person,” to the extent it seeks information dating back to January 1, 2013, and to the extent it seeks information related to complaints irrelevant to her present claims, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent this Interrogatory requires Fox News to speculate about the knowledge of persons who are not Fox News employees and those whom Fox News has not yet had the opportunity to depose. Subject to and without waiving these or the General Objections, Fox News responds that Plaintiff never made any complaint regarding discrimination or a hostile work environment based upon gender during her employment with Fox News.

INTERROGATORY NO. 8: Identify each and every employee and/or former employee of Fox who at any time had power to control the terms, conditions or compensation of Ms.

Eckhart's employment with Fox, including all individuals whose opinions would be considered in setting the terms, conditions or compensation of Ms. Eckhart's employment.

RESPONSE TO INTERROGATORY NO. 8:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms "power[.]" "terms, conditions" and "opinions would be considered[.]" Fox News further objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term "each and every employee and/or former employee" and its lack of temporal limitation, and therefore the burden of the proposed discovery outweighs its likely benefit. Subject to and without waiving these or the General Objections, Fox News identifies Brad Hirst, Liz Claman, Denise Collins, Kevin Lord, Kevin Burke, Gary Schreier, Tom Bowman, Amy Listerman.

INTERROGATORY NO. 9: Identify each and every employee and/or former employee of Fox who at any time had power to control the terms, conditions or compensation of Henry's employment with Fox, including all individuals whose opinions would be considered in setting the terms, conditions or compensation of Henry's employment.

RESPONSE TO INTERROGATORY NO. 9:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms "power[.]" "terms, conditions" and "opinions would be considered[.]" Fox News further objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term "each and every employee and/or former employee," its lack of temporal limitation, and the lack of

relevance as to Henry's compensation, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Subject to and without waiving these or the General Objections, Fox News identifies Roger Ailes, Bill Shine, Jay Wallace and Kevin Lord.

INTERROGATORY NO. 10: Identify each and every employee and/or former employee of Fox with whom Henry discussed any changes to Ms. Eckhart's title and/or position with the Company.

RESPONSE TO INTERROGATORY NO. 10:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms "discussed" and "title and/or position[.]" Fox News further objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term "each and every employee and/or former employee" and its lack of temporal limitation, and therefore the burden of the proposed discovery outweighs its likely benefit. Subject to and without waiving these or the General Objections, Fox News responds that it is not aware that Henry discussed Ms. Eckhart's title or position with anyone at the Company.

INTERROGATORY NO. 11: Identify each and every employee and/or former employee of Fox involved in Fox's decision to suspend Henry in or around 2016.

RESPONSE TO INTERROGATORY NO. 11:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms "involved" and "suspend." Fox News objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case

based on its use of the term “each and every employee and/or former employee” and its relation to an irrelevant occurrence in 2016, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Subject to and without waiving these or the General Objections, Fox News identifies Roger Ailes, Bill Shine and Dianne Brandi as persons with knowledge as to employment actions taken as to Henry in 2016.

INTERROGATORY NO. 12: Identify each and every employee and/or former employee of Fox involved in Fox’s decision to end Henry’s suspension in or around 2016.

RESPONSE TO INTERROGATORY NO. 12:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms “involved” and “suspension.” Fox News objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every employee and/or former employee” and its relation to an irrelevant occurrence in 2016, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Subject to and without waiving these or the General Objections, Fox News identifies Roger Ailes, Bill Shine and Dianne Brandi as persons with knowledge as to employment actions taken as to Henry in 2016.

INTERROGATORY NO. 13: Identify each and every person who has knowledge concerning any sexual encounter between Henry and Ms. Eckhart, including, but not limited to, any individuals with whom Henry discussed the sexual encounter(s).

RESPONSE TO INTERROGATORY NO. 13:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by term “knowledge concerning any sexual encounter.” Fox News objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every person[.]” inclusion of “any sexual encounter” and its lack of temporal limitation, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent this Interrogatory requires Fox News to speculate about the knowledge of persons who are not Fox News employees and those whom Fox News has not yet had the opportunity to depose. Subject to and without waiving these or the General Objections, Fox News identifies Ed Henry, Jennifer Eckhart and Gregg Gillman and Sharon Cohen of Davis & Gilbert LLP.

INTERROGATORY NO. 14: Identify each and every person with whom Henry has discussed since 2016 any sexual relationship with any intern, contractor or employee of Fox.

RESPONSE TO INTERROGATORY NO. 14:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms “each and every person” and “sexual relationship[.]” Fox News objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every person[.]” inclusion of “any sexual relationship,” its request for information dating to 2016, and its lack of limitation to discussions relevant to Plaintiff’s allegations, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent this Interrogatory requires Fox News to speculate about the knowledge of persons who are not Fox News employees and those whom Fox News has not yet had the opportunity to depose. Subject

to and without waiving these or the General Objections, Fox News identifies Gregg Gillman and Sharon Cohen of Davis & Gilbert LLP.

INTERROGATORY NO. 15: Identify each and every employee and/or former employee of Fox who was consulted concerning the decision to terminate Ms. Eckhart's employment.

RESPONSE TO INTERROGATORY NO. 15:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by the term "consulted[.]" Fox News objects to this interrogatory as overbroad and seeking information that is not proportional to the needs of the case based on its use of the term "each and every employee and/or former employee[.]" and therefore the burden of the proposed discovery outweighs its likely benefit. Subject to and without waiving these or the General Objections, Fox News identifies Brad Hirst, Alicia Cascardi, Kevin Lord, Gary Schreier and Denise Collins.

INTERROGATORY NO. 16: Identify each and every person who participated in the decision to terminate Henry's employment.

RESPONSE TO INTERROGATORY NO. 16;

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by the term "participated[.]" Fox News objects to this interrogatory as overbroad and seeking information that is not proportional to the needs of the case based on its use of the term "each and every person[.]" and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Fox News further objects to the extent this Interrogatory requires Fox News to speculate about the knowledge of persons who are not Fox News employees and those whom Fox News has not yet

had the opportunity to depose. Subject to and without waiving these or the General Objections, Fox News identifies Kevin Lord and Jay Wallace.

INTERROGATORY NO. 17: Identify each and every person with knowledge concerning any instances in which Henry was disciplined, whether formally or informally, by Fox as a result of his treatment and/or relationships with any women, including, but not limited to, female employees of Fox.

RESPONSE TO INTERROGATORY NO. 17:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms “each and every person”, “instances”, “disciplined”, “formally or informally”, and “treatment and/or relationships.” Fox News objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every person” and “any women,” its lack of temporal limitation, and its lack of limitation to knowledge relevant to Plaintiff’s allegations, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent this Interrogatory requires Fox News to speculate about the knowledge of persons who are not Fox News employees and those whom Fox News has not yet had the opportunity to depose. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Subject to and without waiving these or the General Objections, Fox News refers to Responses to Interrogatories Nos. 11 and 16.

INTERROGATORY NO. 18: Identify each and every person involved in the decision in or around 2016 to launch or permit an internal investigation by the law firm Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul Weiss”).

RESPONSE TO INTERROGATORY NO. 18:

Fox News objects to this Interrogatory as vague and ambiguous as it is unclear what is meant by terms “launch” and “permit[.]” Fox News objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every person” and its request regarding an internal investigation unrelated to Plaintiff’s allegations regarding Henry, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent this Interrogatory requires Fox News to speculate about the knowledge of persons who are not Fox News employees and those whom Fox News has not yet had the opportunity to depose. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Subject to and without waiving these or the General Objections, Fox News states that 21st Century Fox retained Paul, Weiss, Rifkind, Wharton & Garrison LLP.

INTERROGATORY NO. 19: Identify each and every person who was interviewed as part of the Paul Weiss investigation in or around 2016.

RESPONSE TO INTERROGATORY NO. 19:

Fox News objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every person” and its request regarding an internal investigation unrelated to Plaintiff’s allegations regarding Henry, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent this Interrogatory requires Fox News to speculate about the knowledge of persons who are not Fox News employees and whom Fox News has not yet had the opportunity to depose. Fox News further objects to the

extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege.

INTERROGATORY NO. 20: Identify each and every person involved in the decision in 2017 to terminate Bill Shine.

RESPONSE TO INTERROGATORY NO. 20:

Fox News objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every person” and as the request relates to Bill Shine who is irrelevant to Plaintiff’s claims, and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to this interrogatory on the grounds it seeks confidential, sensitive and personal information disclosure of which would invade the privacy rights of a former employee of Fox News who is not a party to this action. Fox News objects to the extent this Interrogatory requires Fox News to speculate about the knowledge of persons who are not Fox News employees and those whom Fox News has not yet had the opportunity to depose.

INTERROGATORY NO. 21: Identify each and every person who provided any factual information relied upon by Fox in drafting its Motion to Dismiss.

RESPONSE TO INTERROGATORY NO. 21:

Fox News objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term “each and every person[,]” and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege. Subject to and without waiving these or the General Objections, Fox News states that the Motion to

Dismiss was based on the allegations in the Complaint.

INTERROGATORY NO. 22: Identify each and every person who provided information used in responding to these Interrogatories or Plaintiff's Document Requests.

RESPONSE TO INTERROGATORY NO. 22:

Fox News objects to this interrogatory as overbroad, as seeking irrelevant information, and seeking information that is not proportional to the needs of the case based on its use of the term "each and every person[,]" and therefore the burden of the proposed discovery outweighs its likely benefit. Fox News objects to this Interrogatory to the extent that it seeks information outside the scope permitted by Local Rule 33.3. Fox News further objects to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, and/or other applicable privilege.

Dated: November 15, 2021
New York, New York

Respectfully submitted,

PROSKAUER ROSE LLP

By: /s/ Kathleen M. McKenna
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VERIFICATION

I, Denise Collins, am the Senior Vice President of Human Resources and have read the foregoing Defendant Fox News Network, LLC's Objections and Responses to Plaintiff Jennifer Eckhart's First Set of Interrogatories and know the contents thereof. The answers are based on records and information currently available. Although I do not have direct personal knowledge of every specific fact contained therein, the responses are true to the best of my knowledge, information and belief. The grounds of my knowledge, information and belief are my personal knowledge, documents in the possession of Fox News Network, LLC, and information from employees or agents of Fox News Network, LLC. I reserve the right to make changes in or additions to any of these answers if it appears at any time that errors or omissions have been made or if more accurate or complete information becomes available.

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury that the foregoing is true and correct.



DENISE COLLINS

November 15, 2021